

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JEFFREY M. GOULD IN SUPPORT OF
PLAINTIFFS' REPLY BRIEF IN SUPPORT OF THEIR MOTION TO PRECLUDE
CERTAIN EXPERT TESTIMONY BY DR. LYNNE WEBER**

I, Jeffrey M. Gould, hereby declare:

1. I am Senior Counsel Oppenheim + Zbrak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions. I am counsel for Plaintiffs in the above-captioned case. I have personal knowledge of all facts stated in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Reply Brief in support of their Motion to Preclude Certain Expert Testimony by Dr. Lynne Weber, filed contemporaneously herewith.

3. Attached hereto are true and correct copies of the following exhibits:

Exhibit	Description
A	Memorandum of Understanding (Plaintiffs_00286200-00286250)
B	Excerpt of July 2, 2019 Deposition Transcript of Dr. Terrence P. McGarty

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 11, 2019 in Washington, District of Columbia.



Jeffrey M. Gould
Counsel for Plaintiffs